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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

WHB 318 v. Uber Technologies, Inc., et al.
Case No: 3:24-cv-04889

Case No. 3:23-md-03084-CRB (LJC)

**JOINT STIPULATION TO EXTEND THE
CASE SCHEDULE**

Judge: Hon. Charles R. Breyer
Courtroom: 6-17th Floor

1 Plaintiff WHB 318 and Defendants Uber Technologies, Inc., *et al.* (the “Parties”), by and through
2 their undersigned counsel, stipulate and agree as follows:

3 WHEREAS, the parties previously submitted a stipulation to the Court with the incorrect dates in
4 the proposed order at Docket 4566, which the Court entered on December 12, 2025, at Dkt. 4645. The
5 parties have corrected that error in the proposed order as entered by the Court at docket 4565 with this
6 stipulation and proposed order;

7
8 WHEREAS, after adding WHB 318 to Trial Wave 1, the Court ordered the parties to propose a
9 discovery schedule for that case. ECF 3706;

10 WHEREAS, the parties proposed that fact discovery in WHB 318 be substantially completed by
11 November 3. ECF 3722;

12
13 WHEREAS, the parties also agreed to stagger expert and other pretrial deadlines according to each
14 Wave 1 trial date as they are assigned;

15 WHEREAS, the Parties are working to complete written discovery and fact depositions for WHB
16 318;

17 WHEREAS, the trial in Jaylynn Dean v. Uber Techs., Inc. will begin on January 13, 2026 in
18 Phoenix, Arizona. ECF 4425;

19 WHEREAS no additional cases have been assigned trial dates;

20
21 WHEREAS, the Parties need additional time to conduct a final corporate representative deposition
22 and expert discovery, and request that the Court extend discovery and pretrial deadlines as set forth below;

23 WHEREAS, the Court granted the Parties joint stipulation to extend the case schedule. ECF 4437;

24 WHEREAS, the Parties have agreed to further modify the case deadlines by an additional month
25 as set forth below;

26 WHEREAS, the Parties further agree that nothing about this further stipulated extension will
27 change the anticipated timing or order of upcoming trials;
28

WHEREAS, the Parties are correcting ECF 4566.

NOW THEREFORE IT IS HEREBY STIPULATED AND AGREED by the Parties to extend the case schedule as follows:

EVENT	CURRENT DEADLINE	NEW DEADLINE
Expert Reports	December 19, 2025	January 16, 2025
End of Substantial Fact Discovery	Completed	Completed
Rebuttal Reports	January 16, 2025	February 13, 2026
Close of Discovery	January 30, 2025	February 27, 2026
Dispositive/Daubert Motions	February 13, 2026	March 13, 2026*
Oppositions	February 27, 2026	March 27, 2026*
Replies	March 6, 2026	April 6, 2026*
Trial Date	TBD	TBD

*The Parties agree to revisit whether the dispositive motion and Daubert briefing schedule should be extended or vacated in light of other trial settings.

DATED: December 16, 2025

By: /s/ Laura Vartain Horn

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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

/s/ Laura Vartain Horn

Laura Vartain Horn

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

**[PROPOSED] ORDER GRANTING JOINT
 STIPULATION TO EXTEND THE CASE
 SCHEDULE**

This Document Relates to:

WHB 318 v. Uber Technologies, Inc., et al.
 Case No: 3:24-cv-04889

Judge: Hon. Charles R. Breyer
 Courtroom: 6-17th Floor

The Court hereby GRANTS the Parties' joint stipulation to extend the case schedule as follows:

EVENT	CURRENT DEADLINE	NEW DEADLINE
Expert Reports	December 19, 2025	January 16, 2025
End of Substantial Fact Discovery	Completed	Completed
Rebuttal Reports	January 16, 2025	February 13, 2026
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Trial Date	TBD	TBD

*The Parties agree to revisit whether the dispositive motion and Daubert briefing schedule should be extended or vacated in light of other trial settings.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: _____, 2025

HON. CHARLES R. BREYER
 UNITED STATES DISTRICT COURT JUDGE